



**Re: Al-Khidhr v. Harrison County--Supplemental Disclosure Expert Testimony**

Monday, October 26, 2009 3:29 PM

**From:** "Ian Brendel" <ian.brendel@yahoo.com>  
**To:** chaselaw@bellsouth.net  
**Cc:** hbroom@ddkf.com, jgewin@ddkf.com

Alvin,

On behalf of Defendants Gaston and Thompson, they object to the late production of Dr. Simone's report. Further, if the Court is inclined to allow the untimely designation, Defendants Gaston and Thompson will most likely request an IME under Rule 35 based on the opinions and conclusions given by Dr. Simone.

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**From:** Haley Broom <hbroom@ddkf.com>  
**To:** chaselaw@bellsouth.net; ian.brendel@yahoo.com  
**Cc:** Joe Gewin <jgewin@ddkf.com>; Trish Misko <tmisko@ddkf.com>  
**Sent:** Mon, October 26, 2009 9:43:43 AM  
**Subject:** RE: Al-Khidhr v. Harrison County--Supplemental Disclosure Expert Testimony

Alvin,

I was out of the office Friday and just received your email with attachments. As more fully stated in our Motion to Strike, we object to the designation of Dr. Simone and the untimely production of his report since the Court ordered these materials to be produced two weeks ago.

Also, within the next two business days, we request that you give us dates Mr. Al-Khidhr is available for deposition. The discovery deadline is fast approaching.

Thanks,  
Haley

**Haley N. Broom, Esquire**  
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**From:** chaselaw@bellsouth.net [mailto:chaselaw@bellsouth.net]  
**Sent:** Friday, October 23, 2009 10:11 AM  
**To:** ian.brendel@yahoo.com; Haley Broom  
**Subject:** Al-Khidhr v. Harrison County--Supplemental Disclosure Expert Testimony

Haley and Ian,

Attached please find a supplemental disclosure of expert testimony of Dr. Simone regarding this case. I also attached a copy of the psychological evaluation prepared by Dr. Simone. The first page of the evaluation contains two color photographs. I'll get them reproduced and mail them to you.

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<http://us.mc1139.mail.yahoo.com/mc/showMessage?sMid=42&fid=Al%252dKhidhr&filter=0> 12/8/2009

